

REMARKS

The non-final Office Action of December 27, 2006, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-5 have been canceled without prejudice or disclaimer. New claims 5-18 have been added. Thus, claims 6-18 are pending in the present application.

Claims 1-5 stand rejected under 35 U.S.C. § 101 as the claims are allegedly directed to non-statutory subject matter. Without acquiescing to the rejection, Applicant has canceled claims 1-5 without prejudice or disclaimer. Thus the present rejection is rendered moot.

Claim 1-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bringham et al., Intermediate Financial Management, 1993, the Dryden Press, Fourth Ed. (hereinafter referred to as *Bringham*) in view of U.S. Patent No. 6,795,811 to Epstein (hereinafter referred to as *Epstein*). Applicant respectfully traverses.

Without acquiescing to the rejection, Applicant has canceled claims 1-5 without prejudice or disclaimer. Thus, the present rejection of claims 1-5 is rendered moot. With respect to Applicant's new claims 6-18, neither *Bringham* nor *Epstein*, either alone or in combination, teaches or suggests each and every aspect of Applicant's new claims 6-18. For example, Applicant's independent claim 6 recites, among other features,

determining whether the monetary amounts of the plurality of investment accounts exceed a percent threshold of the total assets, wherein the percent threshold is above 90%;

upon determining that the monetary amounts of the plurality of investment accounts does not exceed the percent threshold of the total assets, adjusting the plurality of investment accounts to include a portion of the identified remaining cash so the monetary amounts of the plurality of investment accounts exceeds the percent threshold of the total assets.

Bringham or *Epstein*, either alone or in combination, fails to teach or suggest these features. As such, the new claims are allowable over the art of record.

CONCLUSION

All rejections having been addressed, Applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the examiner is requested to contact the undersigned at (202) 824-3155.

Respectfully submitted,
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